

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:22-cv-22171-JEM

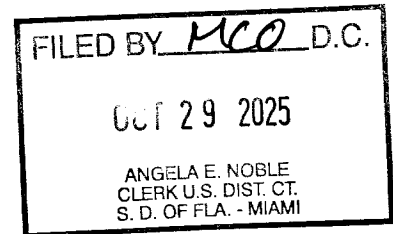
MICHAEL FITZGERALD,
individually, and YELANY DE VARONA,
individually,

Plaintiffs,

v.

RONDA MCNAE, individually, and
WILLIAM MCNAE, individually,

Defendants.



NOTICE OF CLARIFICATION REGARDING REFERENCE TO *DAKER v. OWENS*

Defendant Ronda McNae respectfully submits this Notice, consistent with Fed. R. Civ. P. 11(b), to correct a single inadvertent misstatement in her Reply (DE 478).

1. In Defendant's recent filings, Defendant stated or suggested that Plaintiffs' counsel "highlighted *Daker v. Owens* in an email to chambers."
2. Defendant clarifies that Plaintiffs did **not** raise *Daker* by email. Rather, in their Response DE 477, Plaintiffs referenced the Court's **Omnibus Order (DE 463)** concerning repetitive motions; they did not mention *Daker* by name in that filing (e.g. "repetitive motions. See ECF No. 463 ... sanctions ... pursuant to ECF No. 463.").
3. The *Daker* citation appears in the Court's Omnibus Order (DE 463). To the extent Defendant's prior filings imply otherwise, Defendant withdraws that implication and respectfully asks the Court to treat this as a correction of the record.

Submitted solely to ensure accuracy; all other rights and arguments are preserved.

Respectfully submitted on October 29, 2025,



By: Ronda McNae
Ronda Delapina McNae
Pro se Defendant
504 11th Pl, Kirkland, WA 98033
Tel: (206) 914-6752
Prose.rmcnae@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 29, 2025, a true and correct copy of the foregoing NOTICE OF CLARIFICATION REGARDING REFERENCE TO DAKER v. OWENS was shipped for filing to the Clerk, U.S. District Court, 400 North Miami Avenue, Miami, FL 33128. Additionally, in compliance with the Court's requirements for pro se litigants, a copy of the same document was sent to Plaintiffs' counsel on the same date.

SERVICE LIST

Peter E. Berlowe, Esq.
Meredith Gussin, Esq.
Assouline & Berlowe, P.A.
Miami Tower
100 SE 2nd Street, Suite 3105
Miami, FL 33131
Tel: 305-567-5576
Fax: 305-567-9343
peb@assoulineberlowe.com
mjg@assoulineberlowe.com
Counsel for Plaintiff